

# **Exhibit 6**

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA

3 INTERNATIONAL CHURCH OF )  
4 THE FOURSQUARE GOSPEL, )  
5 plaintiff, )

6 vs. )

Case No.  
C 07-03605 PJH

7 CITY OF SAN LEANDRO, TONY )  
8 SANTOS (in his official )  
capacity), SURLENE G. )  
9 GRANT (in her official )  
capacity), DIANA M. SOUZA )  
10 (in her official )  
capacity), JOYCE R. )  
11 STAROSCIAK (in her )  
official capacity), BILL )  
12 STEPHENS (in his official )  
capacity), JIM PROLA (in )  
13 his official capacity), )  
JOHN JERMANIS (in his )  
14 official and individual )  
capacities), DEBBIE )  
15 POLLART (in her official )  
and individual )  
16 capacities), DOES 1-50, )

17 Defendants. )

18 FAITH FELLOWSHIP FOURSQUARE )  
19 CHURCH, )

20 Real Party in Interest )  
21 \_\_\_\_\_ )  
22

23 DEPOSITION OF ELFORD HENRY CLARK

24 wednesday, May 14, 2008  
25

KASMAR, ZANGLIS & ASSOCIATES (818) 956-1272

1 Q When you say "senior pastor," is that a  
2 full-time position?

3 A Obviously not. I'm sitting here.

4 Q Fair enough. Can you describe it -- is it  
5 part time?

6 A Seems like it is all the time sometimes. It  
7 pretty well occupies my weekends and usually several  
8 evenings per week.

9 Q What is the name of the church in Altadena?

10 A It's the Altadena Foursquare Church, and it  
11 has a slogan name, New Heart Foursquare Church.

12 Q You just need to keep your voice up a little  
13 bit so the court reporter can hear and I can hear as  
14 well.

15 A Okay.

16 Q Is it church No. 1? Church No. 2? Church  
17 No. 56?

18 A I don't recall that it has a number behind  
19 it. So we may be the only Foursquare Church in  
20 Altadena. No, that can't be right. I believe there  
21 is -- well, in fact, I know there is a Hispanic  
22 Foursquare Church in Altadena also, but it may be  
23 known as Altadena Hispanic, which would be another way  
24 sometimes they are denominated.

25 Q If it is denominated as Altadena Hispanic,

1 is that still under the umbrella of the greater church  
2 of ICFG?

3 A Yes. ICFG is a hierarchal church. There is  
4 only one entity.

5 Q Did you say that you had to walk through a  
6 transaction when you were pastor at Altadena?

7 A I did.

8 Q What sort of transaction was that?

9 A Actually, let me correct that. I was not  
10 then the pastor. I was assisting the pastor, but we  
11 did purchase a building.

12 Q When did you make that purchase?

13 A Approximately six years ago.

14 Q Is that where the church is currently housed  
15 and carrying on its religious facilities, services?

16 A It is. 380 Woodbury Road.

17 Q In connection with that transaction, did you  
18 have to make an application for approval of the  
19 purchase of the property to the ICFG?

20 A Yes.

21 Q And at that point in time were you also  
22 serving as legal counsel to ICFG?

23 A Yes.

24 Q Do you recall whether or not that  
25 transaction went to executive committee or went to the

52

KASMAR, ZANGLIS & ASSOCIATES (818) 956-1272